

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

In re:	)	
	)	
SANDRA L. STOJANOVIC,	)	Case No: 10-27377-GLT
	)	
Debtor.	)	Chapter 13
	)	
SANDRA L. STOJANOVIC,	)	Document No.: 190
	)	
Movant,	)	Related to Doc. No. 185
	)	
v.	)	Hearing Date: 03/16/2016 9:00 AM
	)	
	)	Response Deadline: 02/29/2016
	)	
RONDA J. WINNECOUR, Trustee, and	)	
MICHAEL R. RHODES, Clerk of Court,	)	
	)	
Respondents.	)	

**MOTION FOR PAYMENT OF UNCLAIMED FUNDS**

To the Court:

1. The Debtor commenced this case by filing a petition under Chapter 13 on October 20, 2010.

2. On January 15, 2016, a Receipt of Funds Received for Deposit into Registry Account was filed at Docket # 185, a copy of which is attached as Exhibit A, showing an unclaimed funds by Lucy Stojanovic in the amount of \$5,072.90.

3. Attached as Exhibit B is a copy of the Death Certificate for Lucy Stojanovic, who died on June 28, 2014. Attached as Exhibit C is a copy of Lucy Stojanovic's Last Will and Testament. Lucy Stojanovic's husband, Pete Stojanovic, predeceased her. Sandra Lynn Stojanovic, her daughter and the Debtor, is her sole heir. Attached as Exhibit D is a copy of Letters Testamentary granted to Sandra Lynn Stojanovic, the Debtor.

4. 11 U.S.C. §347(a) provides:

Ninety days after the final distribution under section . . . 1326 of this title in a case under chapter . . . 13 of this title, . . . the trustee shall stop payment on any check remaining unpaid, and any remaining property of the estate shall be paid into the court and disposed of under chapter 129 of title 28.

28 U.S.C. §2042 of Chapter 129, in turn, provides:

No money deposited under section 2041 of this title shall be withdrawn except by order of court.

In every case in which the right to withdraw money deposited in court under section 2041 has been adjudicated or is not in dispute and such money has remained so deposited for at least five years unclaimed by the person entitled thereto, such court shall cause such money to be deposited in the Treasury in the name and to the credit of the United States. Any claimant entitled to any such money may, on petition to the court and upon notice to the United States attorney and full proof of the right thereto, obtain an order directing payment to him.

THEREFORE, the Debtors ask the Court to adjudicate that the Debtor, as Executrix and sole heir, is entitled to distribution of Lucy Stojanovic's unclaimed funds, totaling \$5,072.90.

Respectfully submitted,

February 12, 2016

/s/ Dai Rosenblum, Esq.  
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